

EXHIBIT 2

St. John, Joseph

From: Ward, Brian C. (CIV) <Brian.C.Ward@usdoj.gov>
Sent: Monday, March 20, 2023 7:22 PM
To: St. John, Joseph
Cc: Reuveni, Erez R. (CIV); Fudim, Elissa P. (CIV)
Subject: RE: Arizona v. Garland, No. 6:22-1130 (W.D. La.)
Attachments: Joint Motion to Extend Discovery Deadline.docx

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Hey Scott,

Attached is a draft joint motion to extend discovery 60 days, as we discussed on Friday.

Also as we discussed, we're working to get you our initial objections to your discovery requests by the end of the week at the latest, though I'm hoping I can get them to you sooner.

Thanks,
Brian

From: St. John, Joseph <StJohnJ@ag.louisiana.gov>
Sent: Friday, March 17, 2023 1:42 PM
To: Ward, Brian C. (CIV) <Brian.C.Ward@usdoj.gov>
Subject: [EXTERNAL] RE: Arizona v. Garland, No. 6:22-1130 (W.D. La.)

Brian:

If you have a minute, it's probably easier to chat. 225-485-2458.

-Scott

From: Ward, Brian C. (CIV) <Brian.C.Ward@usdoj.gov>
Sent: Thursday, March 16, 2023 3:06 PM
To: St. John, Joseph <StJohnJ@ag.louisiana.gov>
Cc: James Percival <James.Percival@myfloridalegal.com>; Reuveni, Erez R. (CIV) <Erez.R.Reuveni@usdoj.gov>
Subject: RE: Arizona v. Garland, No. 6:22-1130 (W.D. La.)

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Scott,

After discussing further with our clients this week, I anticipate that they will need about another 30 days past the current discovery deadline to search for possibly responsive information. Given that, I propose we move for a 60-day extension of the current discovery deadline to give us another month to exchange responses, while leaving an additional 30 days for any follow up either side might need to do after seeing the responses. We could agree to extend the due

date for both sides to respond to the pending discovery requests to 4/24, and ask the Court to extend the discovery cutoff to 5/23.

Let me know if that works for you. If it does, I'm happy take a first pass at drafting an extension motion to see if we can reach an agreement on something we can file jointly with the Court.

Thanks,
Brian

From: Ward, Brian C. (CIV)
Sent: Thursday, March 09, 2023 5:09 PM
To: St. John, Joseph <StJohnJ@ag.louisiana.gov>
Cc: James Percival <James.Percival@myfloridalegal.com>; Reuveni, Erez R. (CIV) <Erez.R.Reuveni@usdoj.gov>
Subject: RE: Arizona v. Garland, No. 6:22-1130 (W.D. La.)

Thanks, Scott. That's correct. Let's plan on talking again later in the week next week on next steps.

From: St. John, Joseph <StJohnJ@ag.louisiana.gov>
Sent: Thursday, March 09, 2023 4:51 PM
To: Ward, Brian C. (CIV) <Brian.C.Ward@usdoj.gov>
Cc: James Percival <James.Percival@myfloridalegal.com>; Reuveni, Erez R. (CIV) <Erez.R.Reuveni@usdoj.gov>
Subject: [EXTERNAL] RE: Arizona v. Garland, No. 6:22-1130 (W.D. La.)

Brian:

Thanks for the quick call. We agreed to reciprocally extend the due date on our discovery responses by 7 days, *i.e.*, Plaintiffs and Defendants responses would be due 37 days after the respective discovery was served. You are discussing a production timeline with your clients, and we anticipate jointly asking the court to extend the discovery period. You expect to have more certainty on how much time Defendants need by the middle-to-end of next week.

Please confirm this accurately reflects our agreement.

Best regards,
Scott

From: Ward, Brian C. (CIV) <Brian.C.Ward@usdoj.gov>
Sent: Thursday, March 9, 2023 2:28 PM
To: St. John, Joseph <StJohnJ@ag.louisiana.gov>
Cc: James Percival <James.Percival@myfloridalegal.com>; Reuveni, Erez R. (CIV) <Erez.R.Reuveni@usdoj.gov>
Subject: RE: Arizona v. Garland, No. 6:22-1130 (W.D. La.)

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Hey Scott,

Our clients need some additional time to respond to your discovery requests. I'm hoping to know more next week about how much time it will take them to complete these, but for now would you agree to extend our response date by one

week to 3/20 to give me a little more time to get some additional information from my clients and to give us some more time to discuss the timeline for discovery?

Thanks,
Brian

From: Ward, Brian C. (CIV)
Sent: Monday, February 27, 2023 5:58 PM
To: St. John, Joseph <StJohnJ@ag.louisiana.gov>
Cc: James Percival <James.Percival@myfloridalegal.com>; Reuveni, Erez R. (CIV) <Erez.R.Reuveni@usdoj.gov>
Subject: RE: Arizona v. Garland, No. 6:22-1130 (W.D. La.)

I believe that related to the earlier round of discovery from last year and doesn't apply now.

From: St. John, Joseph <StJohnJ@ag.louisiana.gov>
Sent: Monday, February 27, 2023 4:16 PM
To: Ward, Brian C. (CIV) <Brian.C.Ward@usdoj.gov>
Cc: James Percival <James.Percival@myfloridalegal.com>
Subject: [EXTERNAL] RE: Arizona v. Garland, No. 6:22-1130 (W.D. La.)

Brian:

A quick question: the opening of your discovery requests states that "Pursuant to Court order, responses are to be served electronically to Defendants within fourteen days of receiving these requests for production."

I apologize if I've missed something, but can you direct me to that order?

Thanks,
Scott

From: Ward, Brian C. (CIV) <Brian.C.Ward@usdoj.gov>
Sent: Thursday, February 16, 2023 6:09 PM
To: St. John, Joseph <StJohnJ@ag.louisiana.gov>; Reuveni, Erez R. (CIV) <Erez.R.Reuveni@usdoj.gov>
Cc: james.percival@myfloridalegal.com
Subject: RE: Arizona v. Garland, No. 6:22-1130 (W.D. La.)

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Hey Scott,

Attached is our first set of discovery requests.

Thanks,
Brian

From: Ward, Brian C. (CIV)
Sent: Wednesday, February 15, 2023 7:34 PM
To: St. John, Joseph <StJohnJ@ag.louisiana.gov>; Reuveni, Erez R. (CIV) <Erez.R.Reuveni@usdoj.gov>

Cc: james.percival@myfloridalegal.com

Subject: RE: Arizona v. Garland, No. 6:22-1130 (W.D. La.)

Hey Scott,

Our clients are working on these, but I'm not sure we're at a point where a call would be useful. Let us know if there is something specific you want to discuss, but otherwise might make more sense to talk next week instead. We will have served our requests by then as well, so we could also discuss any questions you have at that point.

Thanks,
Brian

From: St. John, Joseph <StJohnJ@ag.louisiana.gov>

Sent: Wednesday, February 15, 2023 3:03 PM

To: Ward, Brian C. (CIV) <Brian.C.Ward@usdoj.gov>; Reuveni, Erez R. (CIV) <Erez.R.Reuveni@usdoj.gov>

Cc: james.percival@myfloridalegal.com

Subject: [EXTERNAL] RE: Arizona v. Garland, No. 6:22-1130 (W.D. La.)

Brian:

If you've had a chance to touch base with your clients, can we chat tomorrow (Thursday)? I'm available any time before noon Central.

Best regards,
Scott

From: St. John, Joseph

Sent: Thursday, February 9, 2023 4:11 PM

To: 'Ward, Brian C. (CIV)' <Brian.C.Ward@usdoj.gov>; Reuveni, Erez R. (CIV) <Erez.R.Reuveni@usdoj.gov>

Cc: 'james.percival@myfloridalegal.com' <james.percival@myfloridalegal.com>

Subject: Arizona v. Garland, No. 6:22-1130 (W.D. La.)

Brian:

Please see the attached document requests. After you have a chance to talk with your clients, let's chat next week to resolve any issues.

Best regards,
Scott



Joseph Scott St. John

Deputy Solicitor General
Office of Attorney General Jeff Landry
Tel: (225) 485-2458
stjohnj@ag.louisiana.gov
www.AGJeffLandry.com

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